

PATRICK R. COSTELLO
DEREK S. BENTSEN
BRIDGET M. FITZPATRICK
ERNESTO G. AMPARO
SECURITIES AND EXCHANGE COMMISSION
100 F Street N.E.
Washington, DC 20549
(202) 551-3982 telephone (Costello)
(202) 772-9245 facsimile
costello@sec.gov

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION, :
Plaintiff, :
v. : Case No. 15-cv-894
(WHP)(JLC)
CALEDONIAN BANK LTD., :
CALEDONIAN SECURITIES LTD., :
CLEAR WATER SECURITIES, INC., :
LEGACY GLOBAL MARKETS S.A., and :
VERDMONT CAPITAL, S.A. :
Defendants. :

**NOTICE OF MOTION TO APPROVE THE SEC'S PROPOSED SETTLEMENT
WITH DEFENDANTS CALEDONIAN BANK, LTD.
AND CALEDONIAN SECURITIES, LTD.**

Plaintiff Securities and Exchange Commission hereby moves the Court to approve the proposed settlement with Defendants Caledonian Bank Ltd. and Caledonian Securities Ltd., together with such other and further relief as the Court deems just and proper. The Commission is filing contemporaneously herewith a Memorandum of Law in support of the proposed settlement to assist the Court in determining whether the settlement is fair, reasonable and in the

public interest, and also to address some of the questions the Court raised in its Opinion and Order entered on November 10, 2015 (ECF No. 140).

Dated: Washington, D.C.
February 9, 2016

Local Counsel:

David Stoelting
Securities and Exchange Commission
Brookfield Place, 200 Vesey Street
New York, New York 20181
(212) 336-0174 telephone
(212) 336-1323 facsimile
stoeltingd@sec.gov

Respectfully submitted,

/s/ Patrick R. Costello
Patrick R. Costello
Derek S. Bentsen
Bridget M. Fitzpatrick
Ernesto G. Amparo
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-5985
(202) 551-3982 telephone (Costello)
(202) 772-9245 facsimile
costello@sec.gov

CERTIFICATE OF SERVICE

I certify that on February 9, 2016, I electronically filed the foregoing NOTICE OF MOTION TO APPROVE THE SEC'S PROPOSED SETTLEMENT WITH DEFENDANTS CALEDONIAN BANK, LTD. AND CALEDONIAN SECURITIES, LTD. using the CM/ECF system, which will send notification of such filing to counsel for Defendants Caledonian Bank Ltd., Caledonian Securities Ltd. and Verdmont Capital, S.A. at the following addresses:

Robert J.A. Zito
Carter Ledyard Milburn LLP
Two Wall Street
New York, New York 10005
zito@clm.com
Attorneys for Defendant
Verdmont Capital, S.A.

Sigal P. Mandelker
Margaret A. Dale
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036
smandelker@proskauer.com
mdale@proskauer.com
Attorneys for Defendants Caledonian
Bank Ltd. and Caledonian Securities
Ltd.

/s/ Patrick R. Costello
Patrick R. Costello